



Benjamin D. Andreozzi, Esq.
(admitted in PA, NY, NJ, AZ)

Nathaniel L. Foote, Esq.
(admitted in PA, NY, NJ)

Veronica N. Hubbard, Esq.
(admitted in PA)

Renee E. Franchi, Esq.
(admitted in PA, MD, CO)

June 10, 2024

Via Email Only [magistrate_judge_arbuckle@pAMD.uscourts.gov]

Magistrate Judge William I. Arbuckle

U.S. District Court

Middle District of Pennsylvania

U.S. Courthouse and Federal Office Building

240 West Third Street

Suite 218

Williamsport, PA 17701

Re: Joint letter to Honorable Judge Arbuckle
4:23-cv-01566-WIA A.M.M. v. Adelphoi Services Inc., et al

Dear Honorable Judge Arbuckle:

We are writing to you to inquire about the status of the *Protective Order and Joint CA, Doc. 17, filed February 29, 2-24*. We are in the process of exchanging discovery, however, much of that information must remain confidential. We circulated a joint protective order for your Honor's approval. We do not believe it has yet been approved. Once a protective order has been approved, we may continue exchanging confidential discovery information.

The parties would be in agreement to hold a brief phone conference with your Honor to discuss, if necessary. Thank you for your time and attention to this matter.

Respectfully,

lsl Renee E. Franchi

Renee E. Franchi, Esquire

REF/mys

cc: Gerard J. Geiger, Esquire (via email only)
Edward J. Henry, Esquire (via email only)